REMARKS

Reconsideration and allowance of the above referenced application is respectfully requested.

The Examiner rejected claims 1-2, 5-6, 9-10, 13, 15-17, 19-21, 23-28, 31, 33, 35, 37, 39, 41, and 43 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,839,766 ("Parnafes") in view of U.S. Patent No. 6,772,413 ("Kuznetsov"). The Examiner rejected claims 32, 34, 36, 38, 40, 42, and 44 under 35 U.S.C. §103(a) as being unpatentable over Parnafes in view of Kuznetsov and U.S. Patent No. 6,931,532 ("Davis"). These contentions are respectfully traversed.

Independent claims 1, 5, 9, 13, 17, 21, and 25 have been amended to specify that the file received by plural clients in a network contains a network policy and multiple translation specifications for translating the network policy from a first schema to multiple, different schemas. Support for this feature is provided, for example, at page 3, lines 11-13 and page 3, line 30 to page 4, line 4.

Accordingly, with the above-indicated amendments to independent claims 1, 5, 9, 13, 17, 21, and 25, applicant considers independent claims 1, 5, 9, 13, 17, 21, and 25, and the respective claims depending from them, to be patentable over the cited art.

Neither Parnafes or Kuznetsov, alone or in combination, disclose or suggest amended claims 1, 5, 9, 13, 17, 21, and 25. For example, nowhere does Parnafes disclose or suggest a file received by plural clients containing both a network policy and multiple translation specifications for translating the network policy from a first schema to multiple, different schemas. Rather, Parnafes discloses:

> [T]he COPS proxy determines non-COPS policy parameters and values that correspond to the policy information, including the PIB variables, received from the policy system in operation 306 of FIG. 3. In particular, the non-COPS policy parameters and values corresponding to the given network device role and/or information are determined. The non-COPS policy parameters and values are chosen from those appropriate for the particular policy protocol by which the given network device is able to receive and interpret policies...

Applicant contends that Parnafes discloses a COPS proxy that determines non-COPS policy parameters and values that are chosen from those appropriate for the particular policy protocol by which the given network device (client) receives and interpret policies. Because the

translation of the policy specification is done at the COPS proxy, there is no need to send a specification to a client. Further, one skilled in the art would not, upon reading Parnafes, deduce sending multiple translation specifications to plural clients.

While Parnafes discloses that the COPS proxy may receive multiple policies, Parnafes does not disclose receiving a file that includes both a network policy and multiple translation specifications, and Parnafes certainly does not disclose a client receiving a file that includes both a network policy and multiple translation specifications. Accordingly, Parnafes neither discloses nor suggests at least the features of "receiving, in a client, a file including both a network policy and multiple translation specifications for translating the network policy from a first schema to multiple, different schemas, the file being the same file that is received by at least plural other clients within a network system," as required by applicant's independent claim 1.

Kuznetsov also neither describes nor suggests sending multiple translation specifications to plural clients. Rather, Applicant contends that Kuznetsov discloses a first formal machine-readable format description (FMRFD) (schema), a second FMRFD (schema), and a data map (DMAP) (translation specification) that, with a translator compiler engine, forms a data translator which may be bidirectional between two data streams between the schemas (Kuznetsov, Column 10, Lines 55-67). As with Parnafes, Kuznetsov, neither describes nor suggests sending a file that includes a network policy and multiple translation specifications to plural clients.

Accordingly, Kuznetsov also fails to disclose or suggest at least the features of "receiving, in a client, a file including both a network policy and multiple translation specifications for translating the network policy from a first schema to multiple, different schemas, the file being the same file that is received by at least plural other clients within a network system," as required by applicant's independent claim 1.

Because neither Parnafes nor Kuznetsov discloses or suggests, alone or in combination, at least the features of "receiving, in a client, a file including both a network policy and multiple translation specifications for translating the network policy from a first schema to multiple, different schemas, the file being the same file that is received by at least plural other clients within a network system," applicant's independent claim 1 and the claims depending from it are patentable over the cited art.

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Independent claims 5, 9, 13, 17, 21, and 25 recite "receive, in a client, a file including both a network policy and multiple translation specifications for translating a policy from a first schema to multiple, different schemas, the file being the same file received by at least plural other clients in a network system," or similar language. For reasons similar to those provided with respect to independent claim 1, at least these features are not disclosed by the cited art. Accordingly, claims 5, 9, 13, 17, 21, and 25, and the claims respectively depending from them are patentable over the cited art.

Independent claims 1, 5, 9, 13, 17, 21, and 25 should therefore be allowable. All of the dependent claims are patentable for at least the reasons for which the claims on which they depend are patentable. All of the claims should hence be allowable.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue, or comment, does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Enclosed is a Request for Continued Examination. The fees in the amount of $810 are being paid concurrently on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other required fees to deposit account 06-1050, referencing the attorney docket number shown above.

Respectfully submitted,

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